

# **EXHIBIT 16**

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -x

5 SERGEY LEONTIEV,

6 Plaintiff,

Case No. 16-cv-3595

7 -against-

8 ALEXANDER VARSHAVSKY,

9 Defendant.

10 - - - - -x

11 December 14, 2016

12 10:40 a.m.

13  
14 Videotaped deposition of  
15 KAREN AVAGUMYAN, taken by Plaintiff,  
16 pursuant to Notice, held at the offices of  
17 Roschier Asianajotoimisto Oy, Keskuskatu  
18 7A, Helsinki, Finland, before  
19 Sharon Lengel, a Registered Professional  
20 Reporter, Certified Realtime Reporter, and  
21 Notary Public of the State of New York.

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23 \* \* \*  
24  
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A P P E A R A N C E S:

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BY: NICHOLAS C. TOMPKINS, ESQ.

COLBY A. SMITH, ESQ.

ALSO PRESENT:

DAVID ROSS ELLIOTT, Videographer

NATALIA MURINA, Interpreter

VICTOR POTAPOV, Check Interpreter

VITALIY POPOV, ESQ.

\* \* \*

1 AVAGUMYAN

2 "Life" is?

3 A. I know it's a group of banks,  
4 probably.

5 Q. Do you know what Collection  
6 Agency "Life" is?

7 A. No.

8 Q. Have you ever received payment  
9 on any notes that were issued in your  
10 name?

11 A. Myself, I didn't.

12 Q. Do you know if your father  
13 received payment?

14 A. I don't know.

15 Q. Did you ask your father to  
16 manage the relationship with the bank  
17 relating to those notes?

18 MR. SMITH: Objection to form.

19 A. I didn't ask him myself, no.

20 Q. He just did it? He just did it?

21 A. I mean, he is the one who  
22 manages all the family money.

23 Q. Did you ever assign your right  
24 to payment under these notes to  
25 Mr. Varshavsky?

1 AVAGUMYAN

2 MR. SMITH: Objection to form.

3 A. (Through the interpreter) No.

4 Q. Did you ever ask your father  
5 what the terms of the notes were?

6 A. No.

7 Q. Did he tell you how much the  
8 notes were for?

9 A. We discussed the --  
10 (Through the interpreter) We  
11 discussed the interest rates.

12 He was telling me about the  
13 interest rates.

14 Q. What did he tell you about the  
15 interest rates?

16 A. They were different, I think,  
17 sometimes, like, around '10, '11. He was  
18 telling me there was good interest rate.

19 Q. Did you ever receive payment of  
20 interest on any of these notes?

21 A. Myself, no.

22 Q. Do you know if your father  
23 received payment of interest on these  
24 notes?

25 A. I don't know.

1 AVAGUMYAN

2 the next exhibit. Plaintiff's 5, I  
3 think.

4 (Plaintiff's Exhibit 5, An  
5 excerpt from a Russian publication,  
6 was hereby marked for identification,  
7 as of this date.)

8 Q. Plaintiff's Exhibit 5 is an  
9 excerpt from a Russian publication.

10 Could you take a look at the  
11 Russian version.

12 Is that a publication that  
13 you're familiar with? Have you ever seen  
14 that publication before?

15 A. No. No.

16 Q. Did you ever come to learn that  
17 Financial Group "Life" had given notice of  
18 its liquidation?

19 A. No.

20 Q. Do you know if you or your  
21 father ever filed a claim against  
22 Financial Group "Life"?

23 A. I myself didn't. I don't know  
24 exactly about my father. He didn't tell  
25 me.

1 AVAGUMYAN

2 Abramova?

3 A. I didn't communicate with  
4 Abramova, no.

5 Q. You know the name?

6 A. Yeah. I know that she was one  
7 of the workers of the bank.

8 Q. How do you know that?

9 A. I've seen her in Avilon many  
10 times together with other workers of the  
11 group, of the Financial Group.

12 Q. Was one of those other workers  
13 named Yanna Krixiuk?

14 A. Yeah, exactly. I've seen them  
15 together.

16 Q. And they were -- but you've  
17 never communicated with them about any  
18 financial matters?

19 A. I've communicated with Yanna  
20 about my personal account.

21 Q. What was -- tell me the  
22 conversation that you had.

23 A. No. It was -- I mean, I was --  
24 I was calling her several times when I  
25 needed to -- to pay something. My card

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CERTIFICATION

I, SHARON LENGEL, a Notary Public for  
and within the State of New York, do  
hereby certify:

That the witness whose testimony as  
herein set forth, was duly sworn by me;  
and that the within transcript is a true  
record of the testimony given by said  
witness.

I further certify that I am not  
related to any of the parties to this  
action by blood or marriage, and that I am  
in no way interested in the outcome of  
this matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 27th day of December,  
2016.



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SHARON LENGEL

\* \* \*